



February 13, 2014

Mr. Phil Perry
Compliance Branch Chief, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Ave.
Indianapolis, IN 46204-2251

**Re: Indianapolis Power & Light Company (IPL) – Petersburg Generating Station
Source ID: 125-0002
New Source Review Post-Project Emissions Submission**

Dear Mr. Perry:

Indianapolis Power & Light Company (IPL) is submitting actual annual emissions data for Units 1, 2, 3, and 4 at IPL - Petersburg Generating Station, located at 6925 N. State Road 57, Petersburg, Indiana, pursuant to 326 IAC 2-2-8(b)(4) and 326 IAC 2-3-2(l)(4). (Attachment A)

IPL believes that the underlying projects were not major modifications and, therefore, are not subject to the New Source Review (NSR) program. In light of the uncertainty associated with the applicability of the NSR program, however, IPL submitted notices to IDEM before implementing the work on each unit and IPL hereby submits this letter and report.

For NSR to apply, the emissions unit must undergo a “major modification”—a physical or operational change that results in an emissions increase. (326 IAC 2-2-2; 326 IAC 2-3-2). A project that is routine maintenance, repair and replacement is, however, specifically excluded from the definition of major modification, irrespective of its impact on emissions. (326 IAC 2-2-1(ee); 326 IAC 2-3-1(y)).

Because the type of work included in the notices is done routinely and the material costs are minimal for each of the projects, IPL concluded that NSR does not apply. These activities were not “major modifications” because they qualify as routine under the routine maintenance, repair and replacement exclusion. (326 IAC 2-2-1(ee)(2)(A); 326 IAC 2-3-1(y)(A)).

Nevertheless, since IPL submitted pre-project notifications, the company also is submitting the post-project annual emissions consistent with 326 IAC 2-2-8(b)(4) and 326 IAC 2-3-2(l)(4).

Should you have any questions regarding this submittal, please contact Angelique Oliger at (317) 261-5852.

Sincerely,

A handwritten signature in black ink, appearing to be 'A. Oliger', with a long horizontal line extending to the right.

Angelique Oliger
Director, Environmental Policy

Cc: Vickie Cordell, IDEM
Pat Austin, IDEM
Jeff Harter, IPL
Byron Taylor, Sidley Austin

enclosure

Attachment A: IPL Petersburg Generating Station
Units 1, 2, 3, and 4
2013 Actual Emissions

Pollutant	Emissions (tons/yr)			
	Unit 1	Unit 2	Unit 3	Unit 4
PM	348	330	1372	641
PM-10	254	200	694	405
PM-2.5	195	200	461	352
SO2	14395	8129	6383	4848
NOx	1868	1413	3583	4043
VOC	23	26	50	44
CO	192	219	417	368
Lead	2.34E-02	5.27E-03	1.48E-01	1.14E-02
Beryllium	4.28E-04	1.89E-04	2.96E-03	2.65E-04
Mercury	3.38E-02	3.87E-02	7.36E-02	6.49E-02
Fluorides	41	46	89	78
H2SO4	25	29	218	192
CO2e	1,795,985	2,058,678	3,907,680	3,446,966